

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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WASHINGTON, D.C. 20268-0001

Mailing Online Service

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Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-16-22)
(December 8, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

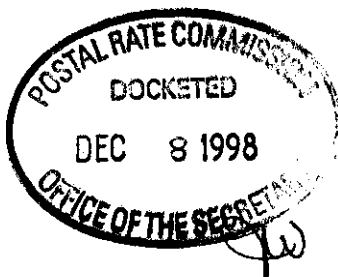
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

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Acting Assistant Director
Office of the Consumer Advocate



OCA/USPS-16. Please refer to the "USPS Qualification Report," appearing at Tr. 6/1423, and to MOL Weekly Report, AP2, Week 4, Tables 2 and 3, filed December 3, 1998.

- a. Please confirm that the Qualification Report reflects an actual mailing. If you do not confirm, please explain.
- b. Please confirm that the Qualification Report is dated October 31, 1998. If you do not confirm, please explain.
- c. Please confirm that the Qualification Report was for a one-piece mailing. If you do not confirm, please explain.
- d. Please confirm that Tables 2 and 3 show a *two-page* mailing and a *three-page* mailing for October 31. Please confirm that these Tables do not explicitly show the numbers of *pieces* in individual mailings. Please explain how the volumes of individual mailings can be determined from the Weekly Reports.
- e. Please confirm that the Qualification Report is postmarked November 2, 1998. If you do not confirm, please explain.
- f. Please confirm that Tables 2 and 3 show no mailings of any kind on November 2, 1998. If you do not confirm, please explain.
- g. Please confirm that Tables 2 and 3 show that one mailing consisting of one piece was recorded on November 3, 1998. If you do not confirm, please explain.
- h. Do the October 31 Qualification Report data appear in Tables 2 and 3 under November 3? Do the October 31 Qualification Report data appear anywhere in the Weekly Reports filed December 3?

- i. How does one match Qualification Report data to MOL Weekly Reports?
- j. Do the dates used for column headings in the Weekly Reports refer to date of job submission, date of transmission to printer, date of printing, date of acceptance into mail processing, or some other date? Is the reference consistent across dates? Please explain.
- k. Does a "date" run from midnight to midnight eastern time? If not, please define the time period covered by a "date."
- l. Please confirm that transactions submitted on either side of the 2:00 cutoff time (e.g., at 1:00 and at 3:00) are reported as occurring on the same date, even though such transactions will not be transmitted to the printer on the same date. If you do not confirm, please describe how the 2:00 cutoff time affects transactions as they appear in the MOL Weekly Reports.

OCA/USPS-17. Please refer to the MOL Weekly Reports filed on December 3, 1998.

- a. Please confirm that the Market Test of MOL has been operational since October 30, 1998. If you do not confirm, please provide the correct date.
- b. Please confirm that between October 30 and November 13 there was nonzero volume for MOL on the following dates: 31-Oct, 3-Nov, 5-Nov, 6-Nov, 7-Nov, 9-Nov, 10-Nov, 11-Nov, 12-Nov, and 13-Nov. If you do not confirm, please provide the correct dates.
- c. Please confirm that the only day on which MOL volume exceeded double digits was 5-Nov. If you do not confirm, please list all dates on which MOL volume exceeded 99.

- d. Please confirm that on 5-Nov there were three transactions from three different mailers. If you do not confirm, please provide the correct numbers and show their derivation.
- e. Please confirm that on 5-Nov, one transaction consisted of three printed pages (simplex, spot color), one transaction consisted of 1085 printed pages (duplex, b&w), and one transaction consisted of 2406 printed pages (simplex, b&w). If you do not confirm, please provide the correct numbers and show their derivation.
- f. Please confirm that no batching of jobs occurred on 5-Nov. If you do not confirm, please explain.
- g. Please provide the number of *pieces* associated with each transaction on 5-Nov and show how these numbers can be derived from data in the MOL Weekly Reports.
- h. Please provide the Qualification Reports associated with the transactions appearing under 5-Nov in the MOL Weekly Reports.

OCA/USPS-18. Please refer to the response to interrogatory OCA/USPS-10d.

- a. Please provide a copy of the "user's guide" referred to in that response.
- b. Please provide hard copy of all "on-line help" screens referred to in that response.

OCA/USPS-19. Please refer to Postal Service witness Plunkett's response to interrogatory OCA/USPS-T5-51d, filed December 7, 1998.

- a. Please confirm that for certain presort categories, MOL Qualification Reports will always have zero volume in those categories because the categories are not automation categories. If you do not confirm, please provide examples of MOL pieces that would fit in each category shown on a Qualification Report.
- b. Please indicate which presort categories on a Qualification Report will be used for MOL mailings and which will not.

OCA/USPS-20. Please refer to Postal Service witness Plunkett's response to interrogatory OCA/USPS-51e, filed December 7, 1998. Please alter witness Plunkett's hypothetical slightly. "[C]onsider a customer who submits a 400[0]-piece Standard (A) mailing to Mailing Online, with 100[0] pieces going to each of four different 3-digit areas, each served by different printers."

- a. Please confirm that the presorting program used by Mailing Online *automatically* "distributes" pieces to print sites simply by presorting to greatest depth of sort. That is, when the 4000-piece mailing has been presorted, the "pieces going to each of four different 3-digit areas" will also have been identified and separated.
- b. Please provide an example of an MOL mailing that would not be sorted (i.e., "distributed") to print sites simply as a result of its being presorted to maximum depth of sort.
- c. Please explain why "distributing" to print sites first and then presorting is not wasteful, as it would appear that both "distributing" and presorting can be accomplished in a single pass.

- d. Please confirm that the total postage bill for the 4000-piece mailing is unaffected by the order in which "distributing" and presorting are done. If you do not confirm, please explain.
- e. Please provide an example of an MOL mailing for which the total postage bill *would* be affected by the order of "distributing" and presorting.
- f. Please confirm that *if* the total postage bill for an MOL mailing is unaffected by the order of "distributing" and presorting, then the depth of sort achieved by presorting the entire mailing in one pass must be functionally equivalent to the depth of sort achieved by first splitting the mailing among print sites and then presorting each print site's pieces separately. If you do not confirm, please explain and provide a counter-example; i.e., provide an example of an MOL mailing whose total postage bill is unaffected by the order of "distributing" and presorting

OCA/USPS-21. Are customers from Tampa and Hartford automatically customers of MOL for the Market Test? Would such customers be automatically purged from the rolls for failing to use MOL for 30 days (e.g., October 1 through October 30)? How many operations-test customers have used MOL during the Market Test? How much volume have such customers submitted?

OCA/USPS-22. Please refer to the "USPS Qualification Report," appearing at Tr. 6/1423.

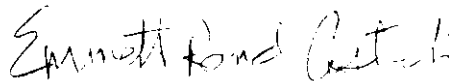
- a. Please confirm that the abbreviations, CB, 5B, 3B, 3/5B, BB, BS, and SP refer to presort levels. If you do not confirm, please explain.
- b. Please confirm that the abbreviations referred to in part (a) of this interrogatory represent the following:
 - i. CB means Carrier Route for First-Class or Standard Mail (A), letter- or flat-shaped mail;
 - ii. 5B means 5-Digit Automation Presort for First-Class or Standard Mail (A) letter-shaped mail;
 - iii. 3B means 3-Digit Automation Presort for First-Class or Standard Mail (A) letter-shaped mail;
 - iv. 3/5B means 3/5-Digit Automation Presort for First-Class or Standard Mail (A) flat-shaped mail;
 - v. BB means Basic Automation Presort for First-Class or Standard Mail (A) letter- or flat-shaped mail;
 - vi. BS means Regular Presort for First-Class letter-shaped mail, and;
 - vii. SP means Single Piece for First-Class letter- or flat-shaped mail.

If you do not confirm, please provide the correct definitions.

Docket No. MC98-1

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in cursive script, reading "Emmett Rand Costich".

Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
December 8, 1998